



Missouri Department of Natural Resources
Air Pollution Control Program

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number:

Expiration Date:

Installation ID: 187-0048

Project Number: 2001-03-012

Installation Name and Address

S-R Products
2055 Progress Drive
Farmington, MO 63640
St. Francois County

Parent Company's Name and Address

Siegel-Robert, Inc.
8645 South Broadway
St. Louis, MO 63111

Installation Description:

The S-R Products Farmington, Missouri installation manufactures chrome-plated and/or painted plastic parts for the automotive and appliance industries. This installation consists of 25 spray painting booths, three roller coating paint booths, Electroplating equipment, chemical storage tanks, two boilers, one 24 MMBTU/HR Plater Air Make-up Heater, space heaters and other miscellaneous fuel combustion equipment, one plating rack stripping tank and grinding operations. The installation is located in an ozone maintenance area.

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The S-R Products Farmington, Missouri installation manufactures chrome-plated and/or painted plastic parts for the automotive and appliance industries. This installation consists of 25 spray painting booths, three roller coating paint booths, electroplating equipment, chemical storage tanks, two boilers, one 24 MMBTU/HR plater air make-up heater, space heaters and other miscellaneous fuel combustion equipment, one plating rack stripping tank and grinding operations. The installation is located in an ozone maintenance area.

The installation emissions for the past seven years are listed below. This installation was also known as Huffy Bicycle Company prior to 2001.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
1996	9.06	0.02	4.35	107.59	0.58	0.00	*
1997	8.42	0.03	4.42	113.23	0.80	0.00	*
1998	0.65	0.02	3.47	57.89	2.91	0.00	*
1999	0.31	0.02	3.46	31.32	2.91	0.00	*
2000							
2001			0.75	17.88			*
2002	0.30	0.02	2.5	88.79	0.15	0.00	12.97*

* HAPs were reported as VOCs.

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Paint Booth 1 – Spray and Wipe (EP-1.a)
EU0020	Paint Booth 2 – Spray and Wipe (EP-1.a)
EU0030	Paint Booth 10 – Automatic (EP-1.a)
EU0040	Paint Booth 11 – Automatic (EP-1.a)
EU0050	Paint Booth 12 – Automatic (EP-1.a)
EU0060	Paint Booth 14 – Spray (EP-1.a)
EU0070	Paint Booth 15 – Spray (EP-1.a)
EU0080	Paint Booth 16 – Spray (EP-1.a)
EU0090	Paint Booth 17 – Spray (EP-1.a)
EU0100	Paint Booth 18 – Spray (EP-1.a)
EU0110	Paint Booth 19 – Spray (EP-1.a)
EU0120	Paint Booth 24 – Spray (EP-1.a)
EU0130	Paint Booth 25 – Spray (EP-1.a)
EU0140	Paint Booth 26 – Spray (EP-1.a)
EU0150	Paint Booth 27 – Spray (EP-1.a)
EU0160	Paint Booth 28 – Spray** (EP-1.a)
EU0170	Paint Booth 6 – Spray (EP-1.b)
EU0180	Paint Booth 7 – Spray (EP-1.b)

EU0190	Paint Booth 8 – Spray (EP-1.b)
EU0200	Paint Booth 9 – Spray** (EP-1.b)
EU0210	Paint Booth 13 – Spray** (EP-1.b)
EU0220	Paint Booth 20 – Robotic (EP-1.c)
EU0230	Paint Booth 21 – Robotic (EP-1.c)
EU0240	Paint Booth 22 – Robotic (EP-1.c)
EU0250	Paint Booth 23 – Robotic (EP-1.c)
EU0260	Paint Booth 3 – Roller Coater (EP-1.d)
EU0270	Paint Booth 4 – Roller Coater (EP-1.d)
EU0280	Paint Booth 5 – Roller Coater (EP-1.d)
EU0290	Electroplating (EP-2)
EU0300	24 MMBTU/HR Plater Air Make-Up Heater

** All booths, with the exception of 9, 13, and 28 are installed and operational.

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

2,000 gallon n-butyl acetate tank (EP-3.a)
Two 2,000 gallon acetone tanks (No. 1 and No. 2) (EP-3.b)
2,000 gallon anhydrous ammonia tank (EP-3.c)
6,000 gallon hydrochloric acid tank (EP-3.d)
Two 5,600 gallon nitric acid tanks (No. 1 and No. 2) (EP-3.e)
Two 3,000 gallon sulfuric acid tanks (No. 1 and No. 2) (EP-3.f)
0.85 million Btu/hr natural gas fired boiler (EP-5.a)
8.5 million Btu/hr natural gas fired boiler (EP-5.b)
Space heating and other miscellaneous fuel combustion equipment totaling 71.04 million Btu/hr (EP-6)
Plating rack stripping tank (EP-7)
Miscellaneous grinding of parts (EP-8)

DOCUMENTS INCORPORATED BY REFERENCE

This document has been incorporated by reference into this permit.

- 1) Construction Permit #062002-009
- 2) Construction Permit #062002-009A
- 3) Construction Permit #112001-013
- 4) Construction Permit #052001-001
- 5) Letter from MDNR APCP to S-R Products regarding performance testing of the chromium electroplating process dated August 1, 2002.

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Permit Condition PW001 10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line or origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director;
2. The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3. Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary.

Monitoring:

1. The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. If a violation of this regulation is discovered, the source shall undertake corrective action to eliminate the violation.
2. The following monitoring schedule must be maintained:
 - a. Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b. Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Record Keeping:

A log must be maintained noting the following:

1. Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2. Whether the visible emissions were normal for the installation.
3. Equipment malfunctions that could cause an exceedance of 10 CSR 10-6.170.
4. Any violations of 10 CSR 10-6.170 and any corrective actions undertaken to correct the violation.

Attachment A contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or an exceedance of this regulation.

Permit Condition PW002
10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a. Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b. Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment B, C and D), noting:
 - a. Whether any air emissions (except for water vapor) were visible from the emission units,
 - b. All emission units from which visible emissions occurred, and
 - c. Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions.
3. The permittee shall maintain records of any Method 9 tests performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of the opacity limit established by 10 CSR 10-6.220, or any malfunction which causes a deviation from or an exceedance of this regulation.

Permit Condition PW003

10 CSR 10-6.060

Construction Permits Required – Construction Permit #062002-009A

Plant-Wide Emission Limitations – Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

Emission Limitation:

1. S-R Products (hereafter referred to as Permittee) shall emit into the atmosphere less than the listed amounts of the following pollutants in any consecutive 12-month period from the entire installation: (Special Condition # 2A)

Pollutant	Emission Limitation (ton)
Methyl Ethyl Ketone (2-Butanone)	10.0
Toluene	10.0
Xylene (mixed isomers)	10.0
Ethyl Benzene	10.0
Methanol	10.0
Ethylene Glycol Monobutyl Ether (2-Butoxyethanol)	10.0
Methyl Isobutyl Ketone	10.0
Combined HAPs	25.0
VOCs	240.0

2. The permittee shall not use surface coatings containing HAP other than those specifically listed in this permit until a permit application is submitted to, and approved by, the Missouri Department of Natural Resources' Air Pollution Control Program. (Special Condition #2A)

Monitoring and Record Keeping:

1. The Permittee shall maintain an accurate record of VOC and HAP emitted into the atmosphere from the entire installation. (Special Condition # 2B)
2. The Permittee shall record monthly and rolling 12-month totals of VOC and HAP emissions from the entire installation. (Special Condition #2B)
- A) The Permittee shall use Attachment E, *Monthly VOC Tracking Record*, Attachment F, *Monthly Combined HAP Tracking Record*, and Attachment G, *Monthly Individual HAP Tracking Record*, or equivalent form(s) for the purpose of record keeping VOC and HAP emissions from operations of paint booths.
- B) For operations other than paint booths that emit VOCs and HAPs The permittee shall use in addition to Attachment E, F and G, the following Attachments: Attachment **EFG1**, *Monthly VOC Tracking Record*, Attachment **EFG2**, *Monthly Individual HAP Tracking Record* and Attachment **EFG3** *Monthly Combined HAP Tracking Record* or equivalent form(s) for the purpose of record keeping VOC and HAP emissions from operations of entire installation.
3. Permittee shall maintain all records required by this permit, on-site, for the 60 most recent months and shall immediately make such records available to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all coatings used in entire installation for which records are kept. (Special Condition #2B)

Reporting:

The Permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from the above Monitoring and Record Keeping requirements indicate that the source exceeded the above emission limitations. (Special Condition #2C)

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0010 through EU0250 Surface Coating – Paint Booths						
EU ID	EQ Ref # (Year)	General Description	Stack No.	Manufacturer/ Model #	Control Device Type	Fabric Filter Pressure Drop Range (inches water)
EU0010	EP-1.a	Paint Booth 1 – Spray and Wipe	1S13	Selective Masking	Fabric Filter	P _L – 1*
EU0020	EP-1.a	Paint Booth 2 – Spray and Wipe	1S11	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0030	EP-1.a	Paint Booth 10 – Automatic	1S08	Theirica	Fabric Filter	NA
EU0040	EP-1.a	Paint Booth 11 – Automatic	1S08	Theirica	Fabric Filter	NA
EU0050	EP-1.a	Paint Booth 12 – Automatic	1S08	Theirica	Fabric Filter	NA
EU0060	EP-1.a	Paint Booth 14 – Spray	1S12	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0070	EP-1.a	Paint Booth 15 – Spray	1S14	Fluid-Air	Fabric Filter	P _L – 1*
EU0080	EP-1.a	Paint Booth 16 – Spray	1S15	Fluid-Air	Fabric Filter	P _L – 1*
EU0090	EP-1.a	Paint Booth 17 – Spray	1S16	Fluid-Air	Fabric Filter	P _L – 1*
EU0100	EP-1.a	Paint Booth 18 – Spray	1S17	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0110	EP-1.a	Paint Booth 19 – Spray	1S18	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0120	EP-1.a	Paint Booth 24 – Spray	1S19	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0130	EP-1.a	Paint Booth 25 – Spray	1S20	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0140	EP-1.a	Paint Booth 26 – Spray	1S21	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0150	EP-1.a	Paint Booth 27 – Spray	1S24	Blow Therm	Fabric Filter	P _L – 1*
EU0160	EP-1.a	Paint Booth 28 – Spray**	IS25		Fabric Filter	P _L – 1*
EU0170	EP-1.b	Paint Booth 6 – Spray	1S02	System Technologies	Fabric Filter	P _L – 1*
EU0180	EP-1.b	Paint Booth 7 – Spray	1S03	System Technologies	Fabric Filter	P _L – 1*
EU0190	EP-1.b	Paint Booth 8 – Spray	1S04	System Technologies	Fabric Filter	P _L – 1*
EU0200	EP-1.b	Paint Booth 9 – Spray**	1S22		Fabric Filter	P _L – 1*
EU0210	EP-1.b	Paint Booth 13 – Spray**	1S23		Fabric Filter	P _L – 1*
EU0220	EP-1.c	Paint Booth 20 – Robotic	1S01	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0230	EP-1.c	Paint Booth 21 – Robotic	1S07	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0240	EP-1.c	Paint Booth 22 – Robotic	1S09	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*
EU0250	EP-1.c	Paint Booth 23 – Robotic	1S10	Siegel-Robert, Inc.	Fabric Filter	P _L – 1*

* The Lower Level, P_L, of the pressure drop range is to be established after beginning operation with a new filter. The upper level of the pressure drop range may be adjusted based on the formula given in Permit Condition EU0010-001 through EU0250-001.

** All booths, with the exception of 9, 13, and 28 are installed and operational.

Permit Condition EU0010-001 through EU0250-001

10 CSR 10-6.060

Construction Permits Required – Construction Permit # 062002-009

Equipment Specifications – Particulate Matter Emissions

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Equipment Specifications:

1. Permittee shall control particulate matter emissions from all spray painting booths using particulate filters as specified in the permit application. These filters shall be maintained in accordance with the manufacturers' specifications. Replacement filters shall be kept on hand at all times. (Special Condition #3)
2. The permittee shall ensure that the filters are made of fibers appropriate for the operating conditions expected to occur.
3. The permittee shall change the filters on the automatic paint machines, EU0030, EU0040 and EU0050 (paint booths 10, 11 and 12) once per shift, for shifts in which the associated booth is operated.
4. The permittee shall change the filters in spray painting booths EU0010, EU0020 and EU0060 through EU0250 once per production day.

Emission Limitation:

1. Particulate matter shall not be emitted from this emission unit in excess of that allowed by the formula: $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons/hr. The limit varies based on the value for P for each paint booth included under EP-1 and applies to each paint booth individually.
2. The permittee shall use Attachment H, or equivalent form, to record the particulate matter emissions limit for each spray painting booth and to demonstrate compliance with that limit.
3. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 gr/scf.

Monitoring:

1. The permittee shall ensure that booths equipped with fabric filters, as identified in Table EU0010 through EU0250, shall not be operated without a fabric filter in place.
2. For EU0010, EU0020 and EU0060 through EU0250 The permittee shall check and document the pressure drop across the fabric filter once per operating day on days in which the associated paint booth is operated to confirm that the pressure drop is within the acceptable pressure drop range indicating normal operation for the paint booth filter. The acceptable pressure drop range shall be as follows:
 - a. The lower level of the pressure drop range shall be established by the permittee by recording the pressure drop across the filter within 30 minutes of beginning normal operation after installation of a new filter. This recorded pressure drop shall become the lower level of the acceptable pressure drop range until a new filter is installed
 - b. The upper level of the acceptable pressure drop range shall be the greater of:
 - (1) 1" water or
 - (2) Three times the lower level of the pressure drop range that was established in Condition 2.a above.

Use Attachment I, or an equivalent form, for the purpose of these requirements

3. The permittee shall inspect the filters each shift before spraying begins in a booth and after installation of a new filter.
4. The permittee shall conduct and document a quarterly inspection of the fabric filters for leaks and wear, and of the cleaning sequence of the fabric filters.
5. The permittee shall conduct and document a quarterly inspection of the fabric filter structural components, including ductwork, for leaks and component failures.
6. If abnormal conditions are detected, all appropriate measures for remediation shall be implemented by the permittee within eight hours.

7. The permittee shall ensure that all instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's preventive maintenance recommendations.

Record Keeping:

1. The permittee shall maintain a log with pressure drop readings for each booth, included upward adjustments to the upper level of the pressure drop range given in Table EU0010 through EU0250 and any remediation actions taken to correct conditions resulting in a pressure drop reading outside the acceptable range.
Use Attachment I, or an equivalent form, for the purpose of these requirements.
2. The permittee shall maintain an operating and maintenance log for the fabric filter which shall include the following:
 - a. incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b. maintenance activities, with inspection schedule, repair actions, and replacements, etc.Use Attachment J, or an equivalent form, for the purpose of these requirements.
3. The permittee shall ensure that all inspections, corrective actions, and instrument calibrations shall be recorded.
4. The permittee shall keep on-site, for the life of this permit, the manufacturer's specifications for the fabric filter and any preventative maintenance recommendations.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or an exceedance of this regulation.

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EU0290 Electroplating			
EU ID	EQ Ref # (Year)	General Description	Manufacturer/Model #
EU0290	EP-2	Decorative chrome electroplating tank	Unknown

Permit Condition EU0290-001
10 CSR 10-6.075

Maximum Achievable Control Technology Regulations

40 CFR Part 63, Subpart N

National Emission Standards for Hazardous Air Pollutants for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks

Letter from MDNR APCP to S-R Products regarding performance testing of the chromium electroplating process dated August 1, 2002.

Emission Limitation:

1. The emission limitations in this section apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by §63.342(f) must be followed during malfunctions. (§63.342(b)(1))
2. During tank operation, chromium emissions discharged to the atmosphere from the affected source shall be controlled by use of a chemical fume suppressant containing a wetting agent and by not allowing the surface tension of the electroplating or anodizing bath contained within the affected source to exceed 45 dynes per centimeter (dynes/cm) (3.1×10^{-3} pound-force per foot [lbf/ft]) at any time during operation of the tank. (§63.342(d)(2))
3. The standards in this section that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent. (§63.342(g))

Work Practice Standards

1. The work practice standards of this section address operation and maintenance practices. All owners or operators subject to the standards in §63.342(d) are subject to these work practice standards. (§63.342(f))
 - a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by §63.342(f)(3). (§63.342(f)(1)(i))
 - b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by §63.342(f)(3). (§63.342(f)(1)(ii))
 - c. Operation and maintenance requirements established pursuant to Section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. (§63.342(f)(1)(iii))
2. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Director, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source. (§63.342(f)(2)(i))
3. Based on the results of a determination made under §63.342(f)(2)(i), the Director may require that the permittee make changes to the operation and maintenance plan required by §63.342(f)(3) for that source. Revisions may be required if the Director finds that the plan: (§63.342(f)(2)(ii))
 - a. Does not address a malfunction that has occurred; (§63.342(f)(2)(ii)(A))
 - b. Fails to provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or (§63.342(f)(2)(ii)(B))
 - c. Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. (§63.342(f)(2)(ii)(C))

4. *Operation and maintenance plan.* The permittee shall prepare an operation and maintenance plan to be implemented no later than the compliance date. The plan is incorporated by reference into this Title V permit. The plan shall include the following elements: (§63.342(f)(3)(i))
 - a. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; (§63.342(f)(3)(i)(A))
 - b. For sources using an add-on air pollution control device or monitoring equipment to comply with Subpart N, the plan shall incorporate the work practice standards for that device or monitoring equipment, as identified in Table 1 of §63.342, if the specific equipment used is identified in Table 1 of §63.342; (§63.342(f)(3)(i)(B))
 - c. If the specific equipment used is not identified in Table 1 of §63.342, the plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Director for approval as part of the submittal required under §63.343(d); (§63.342(f)(3)(i)(C))
 - d. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and (§63.342(f)(3)(i)(D))
 - e. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. (§63.342(f)(3)(i)(E))
5. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control devices, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. (§63.342(f)(3)(ii))
6. Record keeping associated with the operation and maintenance plan is identified in §63.346(b). Reporting associated with the operation and maintenance plan is identified in §63.347(g) and (h) and §63.342(f)(3)(iv). (§63.342(f)(3)(iii))
7. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by §63.342(f)(3)(i), the permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Director. (§63.342(f)(3)(iv))
8. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Director for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Director for a period of 5 years after each revision to the plan. (§63.342(f)(3)(v))
9. To satisfy the requirements of §63.342(f)(3), the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of §63.342. (§63.342(f)(3)(vi))

Monitoring and Testing Requirements:

1. *Monitoring to demonstrate continuous compliance.* The permittee shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified below for the air pollution control techniques expected to be used by the permittees of affected sources. (§63.343(c))
 - a. In lieu of establishing the maximum surface tension during the performance test, the permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. However, the permittee is exempt from conducting a performance test only if the criteria of §63.343(b)(2) are met. (§63.343(c)(5)(i))
 - (i) If the owner or operator of an affected source meets all of the following criteria, an initial performance test is not required to be conducted under this subpart: (§63.343(b)(2))
 - (A) The affected source is a decorative chromium electroplating tank or a chromium anodizing tank; and (§63.343(b)(2)(i))
 - (B) A wetting agent is used in the plating or anodizing bath to inhibit chromium emissions from the affected source; and (§63.343(b)(2)(ii))

- (C) The owner or operator complies with the applicable surface tension limit of § 63.342(d)(2) as demonstrated through the continuous compliance monitoring required by paragraph (c)(5)(ii) of this section. (§63.343(b)(2)(iii))
- b. On and after the date on which the initial performance test is required to be completed under §63.7, the permittee shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than 45 dynes/cm shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule: (§63.343(c)(5)(ii))
- (i) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part. (§63.343(c)(5)(ii)(A))
 - (ii) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation. (§63.343(c)(5)(ii)(B))
 - (iii) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in §63.343(c)(5)(ii)(B). For example, if the permittee had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation. (§63.343(c)(5)(ii)(C))
 - (iv) Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of §63.343(c)(5)(ii) (B) and (C). (§63.343(c)(5)(iii))

Record Keeping:

1. All records shall be maintained for a period of 5 years in accordance with §63.10(b)(1). (§63.346(c))
2. The permittee shall maintain the following records for the affected source: (§63.346(b))
 - a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of § 63.342(f) and Table 1 of § 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. (§63.346(b)(1))
 - b. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; (§63.346(b)(2))
 - c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; (§63.346(b)(3))
 - d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; (§63.346(b)(4))
 - e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by § 63.342(f)(3); (§63.346(b)(5))
 - f. Test reports documenting results of all performance tests; (§63.346(b)(6))
 - g. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of § 63.344(e); (§63.346(b)(7))
 - h. Records of monitoring data required by § 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; (§63.346(b)(8))
 - i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; (§63.346(b)(9))

- j. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; (§63.346(b)(10))
- k. The total process operating time of the affected source during the reporting period; (§63.346(b)(11))
- l. For sources using fume suppressants to comply with the standards, records of the date and time that fume suppressants are added to the electroplating or anodizing bath. (§63.346(b)(13))
- m. Any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements, if the source has been granted a waiver under §63.10(f); and (§63.346(b)(15))
- n. All documentation supporting the notifications and reports required by §63.9, §63.10, and §63.347. (§63.346(b)(16))

Reporting:

1. The permittee shall fulfill all reporting requirements outlined in this section and in the General Provisions to 40 CFR part 63, according to the applicability of Subpart A as identified in Table 1 of Subpart N. These reports shall be made to the Director. (§63.347(a))
 - a. Reports required by Subpart A of this part and this section may be sent by U.S. mail, fax, or by another courier. (§63.347(a)(1))
 - i. Submittals sent by U.S. mail shall be postmarked on or before the specified date. (§63.347(a)(1)(i))
 - ii. Submittals sent by other methods shall be received by the Director on or before the specified date. (§63.347(a)(1)(ii))
 - b. If acceptable to both the Director and the permittee, reports may be submitted on electronic media. (§63.347(a)(2))
2. *Notification of performance test.* The permittee shall notify the Director in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Director to have an observer present during the test. Observation of the performance test by the Director is optional. (§63.347(d)(1))
3. In the event the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply. (§63.347(d)(2))
4. ***Ongoing compliance status reports for area sources.*** The requirements of this paragraph do not alleviate affected area sources from complying with the requirements of State or Federal operating permit programs under 40 CFR part 71. (§63.347(h))
 - a. The permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in §63.347(g)(3), shall be completed annually and retained on site, and made available to the Director upon request. The report shall be completed annually except as provided in §63.347(h)(2). (§63.347(h)(1))
 - b. *Reports of exceedances.* If both of the following conditions are met, semiannual reports shall be prepared and submitted to the Director: (§63.347(h)(2)(i))
 - i. The total duration of excess emissions (as indicated by the monitoring data collected by the permittee in accordance with §63.343(c)) is 1 percent or greater of the total operating time for the reporting period; and (§63.347(h)(2)(i)(A))
 - ii. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time. (§63.347(h)(2)(i)(B))
5. Once the permittee reports an exceedance as defined in §63.347(h)(2)(i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under §63.347(h)(3) is approved. (§63.347(h)(2)(ii))
6. The Director may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source. (§63.347(h)(2)(iii))
7. ***Request to reduce frequency of ongoing compliance status reports for area sources.*** (§63.347(h)(3))
 - a. The permittee may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met: (§63.347(h)(3)(i))
 - i. For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; (§63.347(h)(3)(i)(A))
 - ii. The permittee continues to comply with all applicable record keeping and monitoring requirements of subpart A of this part and this subpart; and (§63.347(h)(3)(i)(B))

- iii. The Director does not object to a reduced reporting frequency for the affected source, as provided in §63.347(h)(3) (ii) and (iii). (§63.347(h)(3)(i)(C))
- 8. The frequency of submitting ongoing compliance status reports may be reduced only after the permittee notifies the Director in writing of his or her intention to make such a change, and the Director does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Director may review information concerning the source's previous performance history during the 5-year record keeping period prior to the intended change, or the record keeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of a permittee's conformance with emission limitations and work practice standards. Such information may be used by the Director to make a judgement about the source's potential for noncompliance in the future. If the Director disapproves the permittee's request to reduce reporting frequency, the Director will notify the permittee in writing within 45 days after receiving notice of the permittee's intention. The notification from the Director to the permittee will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. (§63.347(h)(3)(ii))
- 9. As soon as the monitoring data required by §63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the owner shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval from the Director to reduce the reporting frequency as allowed by §63.347(h)(3). (§63.347(h)(3)(iii))

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EU0300 24 MMBTU/HR Plater Air Make-up Heater			
EU ID	EQ Ref # (Year)	General Description	Manufacturer/Model #
EU0300	Part of EP-6	Plater air make-up heater	Unknown

Permit Condition EU0300-001 10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds
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Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Operation Limitation:

The permittee shall burn only pipeline grade natural gas in this emissions unit.

Monitoring/Record Keeping:

The permittee shall maintain an accurate record that only pipeline grade natural gas is burned in this emissions unit. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or an exceedance of this regulation.

Permit Condition EU0300-002
10 CSR 10-3.060

Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.27 pounds per million BTU of heat input.

Operation Limitation:

The permittee shall burn only pipeline grade natural gas in this emissions unit.

Monitoring/Record Keeping:

The permittee shall maintain an accurate record that only pipeline grade natural gas is burned in this emissions unit. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or an exceedance of this regulation.

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IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions

- (a.) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
- (1.) Name and location of installation;
 - (2.) Name and telephone number of person responsible for the installation;
 - (3.) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - (4.) Identity of the equipment causing the excess emissions;
 - (5.) Time and duration of the period of excess emissions;
 - (6.) Cause of the excess emissions;
 - (7.) Air pollutants involved;
 - (8.) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - (9.) Measures taken to mitigate the extent and duration of the excess emissions; and
 - (10.) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- (b.) The permittee shall submit the paragraph (a.) information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- (c.) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- (d.) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- (e.) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060, Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065, Operating Permits

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information

- (a.) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- (b.) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- (c.) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150, Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

- (a.) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- (b.) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- (c.) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-3.030, Open Burning Restrictions

- (a.) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- (b.) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- (c.) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - (1.) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the

- type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
- (2.) The schedule of burning operations;
 - (3.) The exact location where open burning will be used to dispose of the trade wastes;
 - (4.) Reasons why no method other than open burning is feasible; and
 - (5.) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- (d.) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt S-R Products from the provisions of any other law, ordinance or regulation.
- (e.) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-3.090, Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

10 CSR 10-6.100, Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants

40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

- (a) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- (b) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone

- (a.) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- (1.) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
- (2.) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
- (3.) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
- (4.) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- (b.) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - (1.) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - (2.) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - (3.) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - (4.) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - (5.) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - (6.) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- (c.) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- (d.) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280, Compliance Monitoring Usage

- a) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - 1) Monitoring methods outlined in 40 CFR Part 64;
 - 2) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - 3) Any other monitoring methods approved by the director.
- b) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - 1) Monitoring methods outlined in 40 CFR Part 64;

- 2) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - 3) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- c) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- 1) Applicable monitoring or testing methods, cited in:
 - 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - 10 CSR 10-6.040, "Reference Methods";
 - 10 CSR 10-6.070, "New Source Performance Standards";
 - 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - 2) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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V. General Permit Requirements

Permit Duration

10 CSR 10-6.065(6)(C)1.B.

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

I) Record Keeping

- A) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- B) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

II) Reporting

- A) The permittee shall submit a report of all required monitoring by:
 - 1) October 1st for monitoring which covers the January through June time period, and
 - 2) April 1st for monitoring which covers the July through December time period.
 - 3) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- B) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- C) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- D) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - 2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit. These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- E) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- F) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plans Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

Severability Clause

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(6)(C)1.G

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Compliance Requirements

10 CSR 10-6.065(6)(C)3.

- I) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- II) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - A) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - B) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - C) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - D) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- III) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - A) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - B) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- IV) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually on April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - A) The identification of each term or condition of the permit that is the basis of the certification,
 - B) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
 - C) Whether compliance was continuous or intermittent,
 - D) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
 - E) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield

10 CSR 10-6.065(6)(C)6.

- I) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - A) The applicable requirements are included and specifically identified in this permit; or
 - B) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- II) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - A) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - B) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - C) The applicable requirements of the acid rain program,
 - D) The administrator's authority to obtain information, or
 - E) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(6)(C)7.

- I) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, you must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - A) That an emergency or upset occurred and that you can identify the source of the emergency or upset,
 - B) That the installation was being operated properly,
 - C) That you took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - D) That you submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- II) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Operational Flexibility

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- I) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable

requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

- A) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.
- B) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(6)(C)9.

- I) Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - A) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - B) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - C) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - D) The permit shield shall not apply to these changes.

Responsible Official

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by Gene Parker, Works Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening Permit For Cause

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

- 1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

Attachment A

10 CSR 10-6.170 Compliance Demonstration

Fugitive Emission Observations

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition PW001.

[illegible]

Attachment B
10 CSR 10-6.220 Compliance Demonstration
Opacity Observations

This record-keeping sheet may be used for the record-keeping requirements for the Permit Condition PW-002.

[illegible]

* If a violation is observed, daily periodic monitoring is required for a minimum of eight consecutive weeks. If no violations are observed in that time period, then periodic observations shall be conducted daily every other week for a period of 8 weeks. Should no violations be observed in this time period, then periodic observations need be done no more than once per month.

**** If a violation is observed, necessary steps must be taken to bring the source back into compliance as soon as is practical. The date and steps taken should be included here.**

Attachment C

10 CSR 10-6.220 Compliance Demonstration

Opacity Observations

This record-keeping sheet may be used for the record-keeping requirements for the Permit Condition PW-002.

Method 22 (Outdoor) Observation Log

Responsible Installation

Date:

Sky Conditions

Wind Direction

Process Unit

Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points

Observations

Clock

Observation

Accumulated

Begin Observation

[illegible]

Attachment D
10 CSR 10-6.220 Compliance Demonstration

Opacity Emission Observations

Company _____

Observer _____

Location _____

Observer Certification

Date _____

Date _____

Type Facility _____

Time _____

Pt. Of Emission _____

Control Device _____

Hour	Min	Seconds				Steam Plume		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY

Set Number	Time	Opacity	
	Start - End	Sum	Average

Readings ranged from ____ to ____ % opacity.

The Source was/was not in compliance with ____ at the time evaluation was made.

(Signature of Observer)

Attachment E
Compliance Demonstration
Monthly VOC Tracking Record

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

S-R Products
Permit Number: _____

This sheet covers the month of _____ in the year _____

Column 1	Column 2 (a)	Column 3	Column 4	Column 5	Column 6
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (lbs/gal)	VOC Content (Weight %)	VOC Emissions Prior to Control (ton)	VOC Emissions After Control (tons)
(b) Total VOC Emissions Calculated for this Month in ton:					
(c) 12-month VOC Emissions total from Previous Month's Attachment E, in ton:					
(d) Monthly VOC Emissions total (b) from Previous Year's Attachment E, in ton:					
(e) Current 12-month Total of VOC Emissions in ton: [(b) + (c) - (d)]					

Instructions: Choose appropriate VOC calculation method for units reported.

- (a) 1) if usage is in tons - [Column 2] x [Column 4] = [Column 5];
2) if usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
3) if usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5];
- (b) Summation of [Column 6] in ton
- (c) 12-Month VOC emissions total [Column 6] from last month's Attachment E, in ton;
- (d) Monthly VOC emissions total [Column 6] from previous year's Attachment E, in ton;
- (e) Calculate the new 12-month VOC emissions total. A 12-month VOC emissions total (e) of no more than 240 ton indicates compliance.

Attachment F
Compliance Demonstration
Monthly VOC Tracking Record

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

S-R Products
Permit Number: _____

This sheet covers the month of _____ in the year _____

Column 1	Column 2 (a)	Column 3	Column 4	Column 5	Column 6
Process name	Amount of Material Used (Process units /month)	VOC Emission Factor (lb/process unit)	HAP Emission factor (lb/process unit)	Process VOC Emissions(tons)	Process HAP Emissions (tons)
(b) Total HAP Emissions Calculated for this Month in ton:					
(c) 12-month HAP Emissions total from Previous Month's Attachment F, in ton:					
(d) Monthly HAP Emissions total (b) from Previous Year's Attachment F, in ton:					
(e) Current 12-month Total of HAP Emissions in ton: [(b) + (c) - (d)]					

Instructions: Choose appropriate HAP calculation method for units reported.

- (a) 1) if usage is in tons - [Column 2] x [Column 4] = [Column 5];
2) if usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];
3) if usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5];
- (b) Summation of [Column 6] in ton
- (c) 12-Month HAP emissions total [Column 6] from last month's Attachment F, in ton;
- (d) Monthly HAP emissions total [Column 6] from previous year's Attachment F, in ton;
- (e) Calculate the new 12-month combined HAP emissions total. A 12-month HAP emissions total (e) of less than 25.0 ton indicates compliance.

Attachment G

Compliance Demonstration

Monthly Individual HAP Tracking Record

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

S-R Products

Permit Number:

HAP Name _____ CAS No.: _____

This sheet covers the month of _____ in the year _____

[illegible]

Instructions:

- (a) Individually list each material that emits this specific HAP from the entire installation;
- (b) Record the amount of HAP emissions already calculated for Attachment F in [Column 5] in ton;
- (c) Summation of Column 2 in ton;
- (d) Record the previous 12-month individual HAP emission total (f) from last month's Attachment G, in ton;
- (e) Record the monthly HAP emissions total (c) from previous year's Attachment G, in ton;
- (f) Calculate the new 12-month individual HAP emissions total. A 12-month individual HAP emissions total (f) of less than ten (10.0) tons indicates compliance.

**Attachment EFG1
Compliance Demonstration**

Monthly VOC Tracking Record from entire emission points such as Electroplating Air make-up heater, storage tanks, boilers and space heaters added to the Monthly VOC Tracking Record from Surface Coating Calculated in Attachment E

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

S-R Products
Permit Number: _____

This sheet covers the month of _____ in the year _____

Column A ^	Column B ^^	Column C	Column D ^^^	Column E ^^^^	Column 7 *****	Column 8 #####
Process name	Amount of Material Processed (Process unit/ Month)	VOC Emission factor (lb/process unit)	Amount of VOC in Product (Tons)	Monthly sum of VOCs(Tons)	Total of monthly sum of VOCs(tons) for the whole operations including Surface Coating from <u>attachment E</u>	rolling of 12 month sum of VOCs(Tons) for the whole operations including Surface Coating from attachment E

- ^ List Each Emission Unit
 ^^ list Throughout or amount of material processed
 ^^^ Column D = Column B * Column C / 2000
 ^^^^^ Monthly Sum of values in Column D
 ***** Summation of Total VOC Emissions Calculated for this Month in attachment E and Total VOC Emissions Calculated for this Month in Column E of attachment EFG1
 ##### Rolling 12-month sum in Column 7. (a 12-month VOC emissions total of no more than 240 tons indicates compliance)

Compliance Demonstration

Monthly Individual HAP Tracking Record from entire emission points such as Electroplating, Air make-up heater, storage tanks, boilers and space heaters added to the Monthly individual HAP Tracking Record from Surface Coating calculated in attachment G

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

Permit Number: _____

HAP Name	Frequency	Mean	SD	Min	Max	Q1	Q3	Median	Mode	Skewness	Kurtosis	Shapiro-Wilk	Normality	Levene	Homogeneity
1	10	1.5	0.5	1.0	2.0	1.2	1.8	1.5	1.5	0.0	3.0	0.95	Normal	0.95	Yes
2	15	2.0	0.8	1.0	3.0	1.5	2.5	2.0	2.0	0.0	3.0	0.95	Normal	0.95	Yes
3	20	2.5	1.0	1.0	4.0	1.8	3.2	2.5	2.5	0.0	3.0	0.95	Normal	0.95	Yes
4	25	3.0	1.2	1.0	5.0	2.0	4.0	3.0	3.0	0.0	3.0	0.95	Normal	0.95	Yes
5	30	3.5	1.5	1.0	6.0	2.5	4.5	3.5	3.5	0.0	3.0	0.95	Normal	0.95	Yes
6	35	4.0	1.8	1.0	7.0	3.0	5.0	4.0	4.0	0.0	3.0	0.95	Normal	0.95	Yes
7	40	4.5	2.0	1.0	8.0	3.5	5.5	4.5	4.5	0.0	3.0	0.95	Normal	0.95	Yes
8	45	5.0	2.2	1.0	9.0	4.0	6.0	5.0	5.0	0.0	3.0	0.95	Normal	0.95	Yes
9	50	5.5	2.5	1.0	10.0	4.5	6.5	5.5	5.5	0.0	3.0	0.95	Normal	0.95	Yes
10	55	6.0	2.8	1.0	11.0	5.0	7.0	6.0	6.0	0.0	3.0	0.95	Normal	0.95	Yes
11	60	6.5	3.0	1.0	12.0	5.5	7.5	6.5	6.5	0.0	3.0	0.95	Normal	0.95	Yes
12	65	7.0	3.2	1.0	13.0	6.0	8.0	7.0	7.0	0.0	3.0	0.95	Normal	0.95	Yes
13	70	7.5	3.5	1.0	14.0	6.5	8.5	7.5	7.5	0.0	3.0	0.95	Normal	0.95	Yes
14	75	8.0	3.8	1.0	15.0	7.0	9.0	8.0	8.0	0.0	3.0	0.95	Normal	0.95	Yes
15	80	8.5	4.0	1.0	16.0	7.5	9.5	8.5	8.5	0.0	3.0	0.95	Normal	0.95	Yes
16	85	9.0	4.2	1.0	17.0	8.0	10.0	9.0	9.0	0.0	3.0	0.95	Normal	0.95	Yes
17	90	9.5	4.5	1.0	18.0	8.5	10.5	9.5	9.5	0.0	3.0	0.95	Normal	0.95	Yes
18	95	10.0	4.8	1.0	19.0	9.0	11.0	10.0	10.0	0.0	3.0	0.95	Normal	0.95	Yes
19	100	10.5	5.0	1.0	20.0	9.5	11.5	10.5	10.5	0.0	3.0	0.95	Normal	0.95	Yes
20	105	11.0	5.2	1.0	21.0	10.0	12.0	11.0	11.0	0.0	3.0	0.95	Normal	0.95	Yes
21	110	11.5	5.5	1.0	22.0	10.5	12.5	11.5	11.5	0.0	3.0	0.95	Normal	0.95	Yes
22	115	12.0	5.8	1.0	23.0	11.0	13.0	12.0	12.0	0.0	3.0	0.95	Normal	0.95	Yes
23	120	12.5	6.0	1.0	24.0	11.5	13.5	12.5	12.5	0.0	3.0	0.95	Normal	0.95	Yes
24	125	13.0	6.2	1.0	25.0	12.0	14.0	13.0	13.0	0.0	3.0	0.95	Normal	0.95	Yes
25	130	13.5	6.5	1.0	26.0	12.5	14.5	13.5	13.5	0.0	3.0	0.95	Normal	0.95	Yes
26	135	14.0	6.8	1.0	27.0	13.0	15.0	14.0	14.0	0.0	3.0	0.95	Normal	0.95	Yes
27	140	14.5	7.0	1.0	28.0	13.5</									

This sheet covers the month of _____ in the year _____

[illegible]

^ List Each Emission Unit
 ^^ list Throughput or amount of material processed
 ^^^ Column D = Column B * Column C / 2000
 ^^^^ Monthly Sum of values in Column D
 ***** Summation of total Specific Emission Calculated for this Month (Column E) and total specific HAP Emission calculated for the same month in attachment G
 ***** Rolling 12-month sum in Column F. A 12-month of individual Specific HAP emissions total of less than ten (10.0) tons indicates compliance

Attachment EFG3
Compliance Demonstration
Monthly Combined HAP Tracking Record from Electroplating, Air make-up heater, storage tanks, boilers, space heaters, and surface coating

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition PW-003.

S-R Products
Permit Number: _____
This sheet covers the month of _____ in the year _____

Column A ^	Column B ^^	Column C ^^^	Column D ^^^^
HAP name	Total Monthly HAP of this specific HAP from Column F of <u>attachment EFG2</u>	Total Monthly HAP of all different HAPs	Rolling 12 Month Sum of this specific HAP(Tons)

^ List Each HAP name
^^ Get this information from Column F of attachment EFG2
^^^ Summation of Column B of this attachment
^^^^ Rolling 12-month sum of Column C. A 12-month combined HAP emissions total of less than ten (25.0) tons indicates compliance

Pressure Drop Records

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition EU0010-001 through EU0250-001.

Emission Unit ID: _____

Emission Unit Description: _____

[illegible]

* If a pressure drop outside the acceptable pressure drop range is observed, appropriate remediation measures must be taken within eight hours. The date and steps taken should be included here.

Instructions:

When installing a new filter, complete columns 1, 2, 5 and 6.

When establishing the acceptable pressure drop range for a new filter, complete all columns. Note that the acceptable pressure drop range is to be established within 30 minutes of beginning normal operation after installation of a new filter in accordance with permit condition EU0010-001 through EU0250-001. The lower level of this pressure drop range is the pressure drop recorded with a new filter. The upper level of this range is either 1" water or three times the lower level of the pressure drop range.

When recording a pressure drop reading for monitoring purposes, complete columns 1, 2, 3, 5 and 6.

When recording remediation measures taken, complete columns 1, 2, 5 and 6.

When recording the results of other inspections or miscellaneous activities, complete columns 1, 2, 5 and 6.

Attachment J
10 CSR 10-6.400 Compliance Demonstration
Operation and Maintenance Log

This record-keeping sheet may be used for the record-keeping requirements for Permit Condition EU0010-001 through EU0250-001.

Emission Unit ID: _____

Emission Unit Description: _____

Date	Time	Operation and Maintenance Activities*	Signature

* Activities that must be recorded include: a) incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective action; and b) maintenance activities, with inspection schedule, repair actions, instrument calibrations, replacements, etc.

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received May 21, 2003.
- 2) 2002 Emissions Inventory Questionnaire, received April 4, 2003.
- 3) Title V Application Information Request response from S-R Products dated August 22, 2003.
- 4) CRC Handbook of Chemistry and Physics, 64th Edition.
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

- 1) Title VI – 40 CFR Part 82, *Protection of Stratospheric Ozone*,
This rule has been included in the operating permit in order to provided citing for the use of ozone depleting substances.
- 2) 40 CFR Part 68, *Chemical Accident Prevention Provisions*,
This rule has been included in the operating permit as part of the General Permit Requirements.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

- 10 CSR 10-3.080, Restriction of Emission of Visible Air Contaminants,
This rule was rescinded on May 30, 2000. Control of emissions of visible air contaminants is addressed in 10 CSR 10-6.220.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

1. Construction Permit #062002-009A
Construction Permit #062002-009 was amended to apply the emission limitation to the entire installation rather than the paint booths. The respective monitoring and record keeping provisions were not amended when the emission limitation was amended. The operating permit has modified the Monitoring and Record Keeping of Permit Condition PW003 as following:
 - A) References to the “Paint booth” Operations were removed and replaced by “entire installation” to reflect necessary changes caused by the amendment of the emission limitation.
 - B) Attachment EFG1, EFG2 and EFG3 were added to enable the Permittee to keep track of VOCs and HAPs emitted from operations other than paint booth.A construction permit amendment has been requested to mirror the modifications described above

2. Construction Permit #062002-009

The Permit to Construct Number 062002-009 included limits on VOC, individual HAP and total HAP emissions from the installation's paint booths. These limits were not included in the operating permit due to being amended in Construction Permit Number 062002-009A. The operating permit conditions were amended such that the emissions from the entire installation were limited to less than 10/25 for HAPs and 240 for VOCs in any consecutive 12- month period.

The operating permit includes specific conditions relating to 10 CSR 10-6.075, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks (40 CFR 63 Subpart N) that were not included in Permit to Construct Number 062002-009.

Based on a letter from Missouri Department of Natural Resources to S-R Products dated August 1, 2002, Special Condition Number 4A-E of Permit to Construct Number 062002-009 was removed from the permit. This condition required performance testing for the electroplating bath. However, based on the requirements of 40 CFR 63.343, performance testing is not required if the installation controls chromium emissions by maintaining a surface tension on the electroplating bath less than 45 dynes per centimeter. Because S-R Products has chosen to show compliance by maintaining the surface tension in their electroplating bath below 45 dynes per centimeter, the requirements for performance testing were removed from Permit to Construct Number 062002-009 and are not included in the Title V Operating Permit.

3. Construction Permit #112001-013

The special conditions of this construction permit were superceded by Construction Permit #062002-009. Therefore, the special conditions from this permit were not included in the operating permit.

4. Construction Permit #052001-001

The special conditions of this construction permit were superceded by Construction Permit #112001-013. Therefore, the special conditions from this permit were not included in the operating permit.

5. Construction Permit #1197-021

The special conditions of this construction permit were associated with this site when it was owned and operated by Huffey Bicycle. While the current S-R Products installation construction permits for this site have the same installation ID as the Huffey Bicycle permits, Huffey Bicycle is not operating at this location anymore. Also, the emissions units and conditions covered under this construction permit issued to Huffey Bicycle are not applicable to the S-R Products installation. Therefore, the special conditions from this permit were not included in the operating permit.

6. Construction Permit #0897-026

The special conditions of this construction permit were associated with this site when it was owned and operated by Huffey Bicycle. While the current S-R Products installation construction permits for this site have the same installation ID as the Huffey Bicycle permits, Huffey Bicycle is not operating at this location anymore. Also, the emissions units and conditions covered under this construction permit issued to Huffey Bicycle are not applicable to the S-R Products installation. Therefore, the special conditions from this permit were not included in the operating permit.

7. Construction Permit #0397-008

The special conditions of this construction permit were associated with this site when it was owned and operated by Huffey Bicycle. While the current S-R Products installation construction permits for this site have the same installation ID as the Huffey Bicycle permits, Huffey Bicycle is not operating at this location anymore. Also, the emissions units and conditions covered under this construction permit issued to Huffey Bicycle are not applicable to the S-R Products installation. Therefore, the special conditions from this permit were not included in the operating permit.

8. Construction Permit #0994-002

The special conditions of this construction permit were associated with this site when it was owned and operated by Huffly Bicycle. While the current S-R Products installation construction permits for this site have the same installation ID as the Huffly Bicycle permits, Huffly Bicycle is not operating at this location anymore. Also, the emissions units and conditions covered under this construction permit issued to Huffly Bicycle are not applicable to the S-R Products installation. Therefore, the special conditions from this permit were not included in the operating permit.

NSPS Applicability

1) 10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

All tanks at this installation are less than the minimum size specified in the rule and as such are not subject to this regulation.

2) 10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Steam generating units at this installation are less than the minimum size specified in the rule and as such are not subject to this regulation.

MACT Applicability

1) 10 CSR 10-6.075, *National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks* (40 CFR 63 Subpart N).

The installation includes decorative chromium electroplating using a hexavalent chromium bath subject to 40 CFR 63 Subpart N. S-R products has chosen to control chromium emissions by using a chemical fume suppressant containing a wetting agent to maintain the surface tension of the electroplating or anodizing bath at less than 45 dynes/cm as given in 40 CFR 63.342(d)(2). By following this control option and by meeting the criteria under 40 CFR 63.343(b)(2) the installation is exempt from the initial performance test required by Subpart N. Therefore, the operating permit includes the surface tension limit of 45 dynes/cm along with the appropriate conditions relating to 40 CFR 63.343(b)(2). The permit includes appropriate Work Practice Standards given in 40 CFR 63.342(f) and includes requirements for preparation and implementation of an operation and maintenance plan that is incorporated by reference into the operating permit. The operating permit also includes appropriate monitoring, record keeping and reporting requirements of 40 CFR 63 Subpart N. Because the operating permit limits HAP emissions to less than major source threshold levels the 40 CFR Subpart N requirements associated with area sources was included in the operating permit.

2) The Proposed Rule for National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts, 40 CFR 63, Subpart PPPP is found in the December 4, 2002 Federal Register. As proposed, this MACT standard will only apply to an affected facility at a major source of HAP emissions. Because the operating permit limits installation HAP emissions to less than major source threshold levels, Subpart PPPP as proposed would not be applicable to this installation.

- 3) The Final Rule for National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWW is found in the April 21, 2003 Federal Register. This MACT standard only applies to an affected facility at a major source of HAP emissions. Because the operating permit limits installation HAP emissions to less than major source threshold levels, Subpart WWW is not applicable to this installation.

NESHAP Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos*

The requirements of this rule have been summarized and listed in the operating permit.

Other Regulatory Determinations

- 1) Fugitive Emissions: Permit Condition PW001
10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*

The regulation applies to fugitive particulate emissions, with the intent of restricting and preventing fugitive emissions from traveling off property. The requirements of PW001 include standard permit language to cover monitoring of installation activities to demonstrate compliance with this condition.

- 2) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*.

The installation includes numerous combustion equipment used for indirect heating. This rule applies to all indirect heating equipment at the installation irrespective of heat input rating. However, in this permit particulate matter limits have been placed only for indirect heating equipment rated greater than 10 MMBTU/hour (heat input). Equipment that have heat input ratings less than 10 MMBTU/hour have been considered insignificant and not included as applicable units under this rule. This equipment includes the 0.85 MMBTU/hr natural gas fired boiler (EP-5.a), the 8.5 MMBTU/hr natural gas fired boiler (EP-5.b), and numerous space heating and other miscellaneous fuel combustion equipment. However, their heat inputs have been included in calculating the emission limits for new and existing indirect heating equipment.

Only the 24 MMBTU/hour Plater Make-up Air Heater (EU0300) has been given specific conditions pertaining to 10 CSR 10-3.060. A summary of the installation fuel combustion equipment is provided below. Based on a total installation equipment heat input rate of 104.39 MMBTU/hr, the particulate matter emission limit for fuel burning equipment used for indirect heating is 0.27 lb/MMBTU. The only fuel used in indirect heating equipment is pipeline grade natural gas. From AP-42, Section 1.4, *Natural Gas Combustion*, the emission factor for particulate matter from natural gas combustion is 7.6 lb/MMSCF with a table footnote indicating that the emission factor can be converted to lb/MMBTU by dividing by 1,020 (the heating value of natural gas in MMBTU/MMSCF). Therefore, based on the emission factor information from AP-42, total particulate matter emissions from natural gas combustion are estimated to be 0.00745 lb/MMBTU, which is substantially lower than the particulate matter emission limit of 0.27 lb/MMBTU. Therefore, the use of only pipeline grade natural gas in fuel burning equipment used for indirect heating provides reasonable assurance that the particulate matter standard is being met.

Fuel Combustion Information

[illegible]

Unit Heater	2001	0.13
Unit Heater	2001	0.165
Water Heater	2001	0.25
Bake Oven	2001	5
Air Make-up – Plater	2001	24
Blow Off – Plater	2001	1.2
Annealing Oven	2001	1.2
Drying Oven	2001	3.5
Drying Oven	2001	3.5
Plater Drying Oven	2001	3.5
Batch Oven	2001	1
Drying Oven	2001	5
Drying Oven	2001	5
Boiler	2001	8.5
Boiler	2001	0.85
Total		104.39

3) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds.*

The installation includes numerous combustion equipment used for indirect heating. This rule applies to all indirect heating equipment at the installation irrespective of heat input rating. However, in this permit particulate matter limits have been placed only for indirect heating equipment rated greater than 10 MMBTU/hour (heat input). Equipment that have heat input ratings less than 10 MMBTU/hour have been considered insignificant and not included as applicable units under this rule. This equipment includes the 0.85 MMBTU/hr natural gas fired boiler (EP-5.a), the 8.5 MMBTU/hr natural gas fired boiler (EP-5.b), and numerous space heating and other miscellaneous fuel combustion equipment.

Only the 24 MMBTU/hour Plater Make-up Air Heater (EU0300) has been given specific conditions pertaining to 10 CSR 10-6.260. The sulfur dioxide emission limit for fuel burning equipment used for indirect heating is 8 lb/MMBTU. The only fuel used for indirect heating is pipeline grade natural gas. Based on the emission factor from AP-42, Section 1.4, *Natural Gas Combustion*, total sulfur dioxide emissions from natural gas combustion are estimated to be 0.0006 lb/MMBTU. Therefore, the use of only pipeline grade natural gas in fuel burning equipment used for indirect heating provides reasonable assurance that the sulfur dioxide standard is being met.

4) 10 CSR 10-6.400, *Restriction of Emissions of particulate matter From Industrial Processes.*

According to information provided by S-R Products the installation includes a few small grinders and the emissions generated from these grinders are fugitive emissions. Per 10 CSR 10-6.400((1)(B)7 the provisions of 10 CSR 10-6.400 do not apply to fugitive emissions. Therefore, this rule is not applicable to the grinders and the grinders have not been included as applicable emission units under this rule. Therefore, this permit does not include emission unit specific emission limits for the grinders.

5) 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that meets the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

The installation does not contain a pollutant specific emission unit with uncontrolled emissions greater than major source threshold levels. Therefore CAM requirements do not apply to this installation.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

Samer Al-Shoukhi
Environmental Engineer

Mr. Gene Parker
S-R Products
2055 Progress Drive
Farmington, MO 63640

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED

Re: S-R Products, Installation ID Number: 187-0048
Permit Number: **OP**

Dear Mr. Parker:

Enclosed with this letter is your operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Pamela S. Muren, P.E.
Operating Permit Unit Chief

PSM/sad

Enclosures

c: Ms. Harriett Jones, US EPA Region VII
Ms. Amy Baker, Southeast Regional Office
PAMS File: 2001-03-012

Mr. Lucas White
S-R Products
2055 Progress Drive
Farmington, MO 63640

CERTIFIED MAIL: 7002 0860 0007 6970 8385
RETURN RECEIPT REQUESTED

RE: Draft Title V Operating Permit – Project Number: 2001-03-012

Dear Mr. White:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Title V permit application. A public notice will be placed in the *St. Francois County Daily Journal* in Park Hills, Missouri on Tuesday, December 16, 2003.

The APCP will accept comments regarding the draft permit that are postmarked on or before the closing date. It is very important that you read and understand this legal document. You will be held responsible for complying with this document.

Please address comments or recommendations for changes to my attention at:

Operating Permits Unit
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Samer Al-Shoukhi
Environmental Engineer

SA/dg

Enclosures

c: PAMS File: 2001-03-012

Mr. David Kolaz, Bureau Chief
Illinois Environmental Protection Agency
Division of Air Pollution Control
P.O. Box 19276
Springfield, IL 63794-9276

RE: Affected States Review – Notification of Proposed Final Part 70 Operating Permit

Dear Mr. Kolaz:

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)1. and the Clean Air Act this letter is to notify you of public notice of the preliminary draft and request for comments for:

S-R Products in Farmington, Missouri
Project Number: 2001-03-012

Public notice will be published in the St. Francois County Daily Journal in Park Hills, Missouri on December 16, 2003.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing by no later than January 15, 2003 to my attention at the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Should you require further information or documentation on this matter, please contact the Operating Permits Unit at (573) 751-4817, or you may write to the address listed above. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Pamela S. Muren, P.E.
Operating Permits Unit Chief

PSM/sad

Enclosures

PAMS File: 2001-03-012